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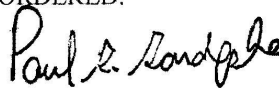
September 13, 2021

**Memo Endorsed:** This application is granted. The telephonic initial pretrial conference is adjourned to November 18, 2021 at 11:45 a.m. At that time, the parties' pre-motion letters will be discussed.

**VIA ELECTRONIC FILING**

Hon. Paul G. Gardephe  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2204  
New York, New York 10007

SO ORDERED.



Paul G. Gardephe  
United States District Judge

Dated: September 15, 2021

Re: *Cairn Energy PLC and Cairn UK Holdings Limited v. Air India Ltd.*,  
No. 1:21-cv-04375-PGG

Dear Judge Gardephe:

Plaintiffs Cairn Energy PLC and Cairn UK Holdings Limited (“**Plaintiffs**”) and Defendant Air India Ltd. (“**Defendant**,” collectively with Plaintiffs, the “**Parties**”) respectfully submit the enclosed joint request for the Court to stay any further proceedings in the above-referenced action, including consideration of the Parties’ pre-motion conference letters (ECF Nos. 21, 24) through October 31, 2021. For the Court’s reference, the current scheduled dates for this action are:

| SUBMISSION/COURT APPEARANCE                             | CURRENT DATE     |
|---|------------------|
| Pre-Motion Conference                                   | To Be Assigned   |
| Joint Pretrial Letter and Proposed Case Management Plan | October 21, 2021 |
| Initial Pretrial Conference                             | October 28, 2021 |

On May 14, 2021, Plaintiffs brought this action against Defendant to hold Defendant liable as the alter ego of the Republic of India (“**India**”) for the obligations India owes under a foreign arbitral award (the “**Award**”). ECF No. 1. Plaintiffs separately filed a petition before the District Court for the District of Columbia to recognize and enforce the Award against India (the “**D.D.C. Action**”) on February 12, 2021. *Cairn Energy PLC, et al. v. Republic of India*, No. 21-cv-00396.

**quinn emanuel urquhart & sullivan, llp**

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Pursuant to Rule IV.A of the Court's Individual Rules of Practice, the Parties submitted their respective pre-motion conference letters regarding Defendant's intent to file a motion to dismiss this action and Plaintiffs' intent to file an opposition and a cross-motion. ECF Nos. 21, 24. The Court has not yet scheduled the pre-motion conference.

There is good cause to grant the Parties' joint request to stay further proceedings in this action. The extended schedule would provide the Parties additional time to evaluate the effects and implications of the recently enacted Taxation Laws (Amendment) Act, 2021 (India), dated August 13, 2021, which relates to the disputes underlying the Award Plaintiffs are seeking to enforce against Defendant. The implementing regulations are in the rule making process and will take some time. For the same reason, Plaintiffs and India have jointly moved for an extension of all the briefing deadlines in the D.D.C Action through October 31, 2021.

The Parties accordingly respectfully request that the Court stay any further proceedings in this matter through October 31, 2021, and reschedule the initial pretrial conference and, respectively, the deadline for the Parties to submit their Joint Pretrial Letter and Proposed Case Management Plan, for new dates in November 2021. The Parties have conferred and agree that the stay will facilitate the efficient resolution of the dispute, conserve the Court's and Parties' resources, and is not intended to obstruct or delay.

Prior to this request, the Court has granted the Parties' requests for extensions twice. On July 16, 2021, the Court granted the Parties' joint request for a 45-day extension for Defendant to respond to the Complaint and adjourned the initial pretrial conference to October 28, 2021 (ECF No. 19). On August 25, 2021, the Court granted the Parties' joint request for a 7-day extension for Plaintiffs to respond to Defendant's pre-motion conference letter (ECF No. 23). No other request for extensions has been made in this action.

Respectfully submitted,



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cc: Counsel of Record (via ECF)